

Administrative

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10 JUN 1976

DD/A Registry  
76-2999

MEMORANDUM FOR: Director of Personnel

STATINTL

FROM :   
Chief, Position Management & Compensation Division

SUBJECT : Review of Grade Allocations for Positions within the  
Information and Privacy Staff, ODDA

REFERENCE : (a) Memo for D/Pers from DD/A dtd 15 April 1976  
(b) Memo for DD/A from C/IPS dtd 12 April 1976; Subj:  
PMCD Grade Evaluation of the Information Privacy  
Staff  
(c) Memo for DD/A from D/Pers dtd 13 Feb 1976; Subj:  
Survey of the Information and Privacy Staff

1. We have again reviewed the IPS job information and related internal and external job comparison data, along with the contents of referent memoranda, to determine the appropriateness of grade allocations for certain positions within the Information and Privacy Staff. This additional review, as indicated in subsequent paragraphs, supports our initial findings, as follows:

Chief, IPS	GS-15
Deputy Chief, IPS	GS-14
Chief, <span style="border: 1px solid black; display: inline-block; width: 150px; height: 1.2em; vertical-align: middle;"></span>	GS-07
Chief, <span style="border: 1px solid black; display: inline-block; width: 150px; height: 1.2em; vertical-align: middle;"></span>	GS-07

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2. A comparison of the Chief, IPS position with a similar FBI position indicates that the FBI position has a greater degree of responsibility for substantive research activity. The FBI position also has responsibility for supervising approximately eighty professional and clerical employees, indicating that the personnel management responsibilities are greater than those of the IPS position. As to the grade of the FBI position and incumbent, PMCD on several occasions contacted FBI classification personnel who advised that both the position and incumbent grades were currently GS-15. However, even if the incumbent and position are

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graded at GS-16 level, this would not alter our original finding regarding the Chief, IPS position grade. The FBI position, in our view, is a stronger position both in terms of scope and substantive responsibilities. Other comparisons are found in the Department of State and DoD where the duties and responsibilities of the Information and Privacy positions closely relate to those of Chief, IPS in terms of coordination, timeliness of responses, contacts with requesters, etc. Both the Department of State and DoD positions are allocated at the GS-15 level. In regard to internal comparisons, we note that issue was taken with the PMCD statement that the Office of Security position makes determinations as to what may be released to the public - a responsibility not inherent in the Chief, IPS position. We were reasoning as follows: As part of the substantive research process a basic determination must be made as to the content of the response in terms of source of information, validity, relationship to other data, etc. The results of this substantive research process (which is performed by the Office of Security) become the basis for what is released to the public. Essentially the same relationship holds true with regard to the DDO function. Although Chief, IPS, in coordinating the basic response data from different Agency components, may question the degree of information provided before formally releasing the Agency reply, such coordination and information coverage effort does not provide a basis for additional grade credit beyond grade GS-15. Accordingly, the position of Chief, IPS is recommended at grade GS-15, and the position of the Deputy Chief, IPS is correspondingly recommended at GS-14 based on the job relationship to the Chief, IPS. STATINTL

3. With regard to the position of Chief, [redacted] the Chief, IPS states that he cannot make a particularly strong case for a GS-08 grade (he had originally proposed grade GS-09), but that the position will assume additional responsibility for originating letters as IPS contracts in size. At present, however, since the primary duties of the position are similar to GS-07 level duties of a Chief of Registry, PMCD recommends the previous GS-07 allocation but will of course conduct a further review of this position when additional duties have been assigned.

STATINTL 4. We also recommend our previous GS-07 allocation for the position of Chief, [redacted] In comparing the position to that of the GS-08 Word Processing Supervisor in OTR, the classifiers involved in surveying OTR/TAP and IPS compared job duties and related factors of the two positions and found that the OTR position evaluates one grade higher than the IPS Processing position. Incidentally, our review of OTR/TAP involved approximately five working days of position audits and additional manhours devoted to comparisons and evaluations.

5. In summary, I believe that our survey identified the grade-determining elements of individual IPS positions and that the grade structure proposed by PMCD reasonably reflects the degree of complexity, STATINTL knowledges required, and overall functions of the Information and Privacy Staff.

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DD/A 76-1902

REFERENCE

a

15 April 1976

MEMORANDUM FOR: Director of Personnel

FROM : John F. Blake  
Deputy Director for Administration

Fred:

1. There are conflicting stories between PMCD and Gene Wilson on the grade of the individual who has the senior working responsibility for FOIA and Privacy Act matters in the Federal Bureau of Investigation.

2. Today, I spoke with Jim Adams, Deputy Associate Director of the Federal Bureau of Investigation, i.e., the third ranking officer. I put the question to him. He consulted his chart of organization and told me as follows. They have an "FOIA - Privacy Act Section". The job for the Section Chief is a GS-16. It is currently encumbered by a GS-15. The Section, which is a part of their Records Division, headed by an Assistant Director, has four units.

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3. Based on this information from Adams, plus what [redacted] has told me of "two job descriptions" for this job, I suggest you forward this memorandum to PMCD to be of assistance as they reconsider this problem.

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[redacted]  
John F. Blake

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76-1823

PERS 76-911

12 April 1976

REFERENCE

b

MEMORANDUM FOR: Deputy Director for Administration

FROM : Gene F. Wilson  
Chief, Information and Privacy Staff

SUBJECT : PMCD Grade Evaluation of the Information and  
Privacy Staff

1. Thank you for the opportunity to provide a rebuttal to the OP/Position Management and Compensation Division proposed grade structure for IPS. In reviewing the PMCD survey, I would generally agree with their grade recommendations in all but four positions. Let me address those positions:

a. Document Control Analyst/Supervisor: This position is currently on the position control roster and was proposed to be continued as a GS-09 position. The incumbent supervises two people and controls the office logs, files and assignment of new cases. The incumbent often prepares much of the initial correspondence to the requester. Because of our continued heavy volume and the developing writing skills, the incumbent does not now originate much correspondence beyond form letters. As IPS contracts in size and case officers depart, however, this position will increase in complexity and responsibility. The incumbent is a GS-08. I would like to see a GS-08 in the position, but I cannot make a particularly strong case at this time.

b. Info Control Supervisor: This is really three positions rolled into one. The incumbent is a secretary steno to Chief, IPS; administrative assistant for the entire staff; and thirdly, and most importantly, she is the typing pool or word processing (to be contemporary) supervisor directing the activities of four typists ranging up to GS-06 level. This responsibility includes training, proofreading, assignment of work, assignment of overtime, and controlling the flow of an average of 70 letters per day to the public. Believe me, this is not a case of exaggerating the duties of a secretary. PMCD's evaluator had some difficulty in locating a benchmark for the comparison of these duties. The closest parallel that could be drawn was a supervisor of the OTR word processing unit. This month I spent one hour in OTR reviewing that job and that operation. I

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submit that the IPS position meets, and in some areas exceeds, the difficulties and responsibility of the OTR GS-08 position. I feel strongly that the IPS position should be at the GS-08 level.

c. The Chief and Deputy Chief of IPS must be considered as one problem. I question PMCD's external job comparison data. In order to determine a comparison, on 5 April 1976 I contacted the FBI, the organization which I believe most closely parallels ours with respect to difficulty and complexity of FOIA and Privacy Act requirements. Contrary to the finding of PMCD, I was advised that Mr. James Power, Chief of their FOIA and Privacy Section, is a GS-16 and his Deputy, Mr. Al McRite, is a GS-15. This organization is responsible for the initial responses and for processing appeals, but not litigation. Below the section level are four units, each headed by a GS-15. Within the units, there are supervisors at the GS-14 level who review the work done by analysts who range in grade from GS-07 to GS-11.

No I do not agree with PMCD's determination that the Information and Privacy Coordinator is a position with the same level of responsibility as the head of the Office of Security's FOIA unit. I was surprised at the statement made by PMCD in its job audit that states, "A major factor in the GS-15 of the Office of Security position was the responsibility for substantive research and for making determinations as to what may be released to the public, a responsibility not inherent in the Chief, IPS position." This is not accurate. The Chief, IPS, must daily make decisions on what is released to the public, both written and oral. Hours of each working day are spent by the Chief and Deputy Chief of IPS reviewing determinations made by Agency components, negotiating changes, and coordinating responses to assure conformity with Agency standards for compliance with the requirements and spirit of the FOI and Privacy Acts. Difficulties in dealing with the public and particularly with the various elements of the press, as they become more knowledgeable of the Acts, have increased in intensity even since this position evaluation was conducted six months ago. For example, on 31 March the Chief, IPS spent one hour on a one-to-one interview with Harper's Magazine and the following hour with a writer from the Washington Post.

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2. The PMCD report and recommendations, in my judgment, present a very simplistic view of the IPS operation. The evaluator emphasized the handling of the routine request for personal records, but demonstrated no depth of understanding of the complexity of many of the other requests, or of the critical role played by the staff in coordinating and reconciling conflicting positions taken by Agency components. (The recent review of the Dulles-Jackson-Correa Report is a good example.) It is entirely possible, if not probable, that IPS staff members failed to devote sufficient time to the interviews and were thus responsible for the failure of the evaluator to gain any depth of understanding of the operation. I accept full blame for this, if such was the case.

3. I do appreciate the opportunity to make my pitch and understand the complication of the final determination. I fully understand that once a determination has been made I will not belabor my concern over the slotting of IPS.

[Redacted Signature]

Gene F. Wilson

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MEMORANDUM FOR: Deputy Director for Administration

SUBJECT : Survey of the Information and Privacy Staff

1. This memorandum presents the survey findings of the Position Management and Compensation Division (PMCD) relative to the position and grade structure of the Information and Privacy Staff (IPS).

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2. Although the Chief, IPS had initially proposed the establishment of 21 positions, the present IPS ceiling (17) for FY 76 has been used as a basis for the position structure developed by PMCD. These totals are reflected in an attached listing which compares the initially-proposed IPS structure with the PMCD evaluated position structure. Based on an analysis of IPS functions, PMCD has recommended a four-element structure which provides for distribution of the 17 ceiling among an Office of the Chief (5 positions); FOIA and Privacy Section (5 positions); Control Section (3 positions); and Processing Section (4 positions).

3. The following comments are provided relative to those positions which PMCD has evaluated at a lower grade than proposed by IPS:

A. Chief, Information Processing Staff GS-15 (IPS Proposed GS-16)

This position was compared with the GS-15 position of the Chief, FOIA and Privacy Section, at the Federal Bureau of Investigation where the incumbent has bureau-wide responsibility for substantive research, appeals, and litigation, in addition to responsibility for the development and implementation of procedures, the establishment of guidelines, policy, and compliance with provisions of the FOIA and Privacy Act.

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The position of Chief, IPS was also compared with a similar (FSO-3) position at the Department of State where the incumbent, as Chief of the Department's FOI Staff, reports to the Bureau for Public Affairs and is responsible for channeling all FOI/Privacy requests to the appropriate bureau, monitoring responses for timeliness and legal compliance, and developing FOI procedures for the Department. The incumbent of this position also renders secretariat support to an ad hoc council of Assistant Secretaries in the formal adjudication of appeal cases.

An additional external comparison was made with the Department of Defense (DoD) position of Chief, FOI/Privacy

Staff. This comparison revealed that the duties and responsibilities of the DoD position are similar to those of the Chief, IPS position. However, the DoD position also contains responsibility for the entire DoD establishment and is allocated at the GS-15 level.

Internally, the position of Chief, IPS was compared with the position of Chief, Information Review Group, Office of Security. This position is allocated at GS-15 level and contains the responsibility for planning, directing, and administering the Office of Security processing of requests from the public, including substantive research on requests, appeals and litigation. A major factor in the GS-15 evaluation of the Office of Security position was the responsibility for substantive research and for making determinations as to what may be released to the public, a responsibility not inherent in the Chief, IPS position. (As previously noted, the FBI position also contains this responsibility, in addition to that of managing the FOIA and Privacy Act program for the entire Bureau.) Although the DDA Assistant for Information has indicated that he plans to transfer the appeals coordination and policy development functions from his position to the Chief, IPS, it would be necessary to very clearly define the resulting responsibilities in order to determine whether additional grade credit might be given to the Chief, IPS position.

In summary, the above external and internal comparisons confirm that, based on duties and responsibilities, the position of Chief, IPS should be allocated at GS-15 level to maintain an equitable grade relationship among senior Agency and non-Agency positions having responsibility for FOI/Privacy matters.

B. Deputy Chief, Information Processing Staff GS-14 (IPS Proposed GS-15)

This Deputy Chief position is evaluated at grade GS-14, one grade below the GS-15 allocation provided for the position of Chief, Information and Privacy Staff. In addition to serving as Deputy Chief of the Staff, the incumbent of this position has responsibility for handling the complex and more important FOIA and Executive Order 11652 requests to determine action to be taken; coordination with responsible components; arranging for review and search of relevant records; and drafting correspondence in reply to requests. The incumbent also serves as the IPS advisor regarding legal requirements and CIA procedures for processing FOI, EO 11652 and Privacy Act requests.

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C. [REDACTED]

Information Control Asst (Supervisor) GS-08 (IPS Proposed GS-9)

Although this position was not encountered at the time of the survey, the Chief, IPS stated that the incumbent of this position would serve as a senior Information Control Assistant. Duties would include responsibility for supervising the GS-07 Information Control Assistants responsible for initiating the search process in response to FOIA and Privacy Act requests; sending out interim responses to requesters; drafting negative responses; compiling information from research results of other components; drafting correspondence for additional information; intra-agency referrals; and maintaining logs on status of requests. In addition to performing these duties, the incumbent would function in a supervisory capacity similar to the supervisors of the [REDACTED] and the [REDACTED]

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Since the worker level Information Control Assistant position in this Section evaluates at GS-07, the supervisory position should be initially established at GS-08 level subject to further review after the duties have actually been performed.

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D. [REDACTED]

Information Control Asst (Supervisor) GS-07 (IPS Proposed GS-09)

The incumbent of this position has responsibility for the receipt, reading, logging, control, records management and assignment of all requests received by the Agency for information relating to FOIA, Privacy Act and EO 11652. Approximately 85% of the incumbent's time is spent either performing or supervising these functions. The incumbent also has contact with the public and the news media in response to routine questions regarding FOIA and the Privacy Act.

This position was compared with a GS-06 Security Assistant Supervisor position which has similar responsibilities on an Office level and is located in the Information Review Group, Office of Security. It was also compared with an Information Control Assistant GS-07 position which is located in the Office of the General Counsel and has responsibility for the receiving, logging, and assignment of incoming and outgoing material; maintaining indexing and retrieval systems for opinions and cases; records management; assisting attorneys in research of background records; and serving as records assistant to the senior attorney responsible for FOIA.

Based on these comparisons and its Agency-wide control functions, the IPS Information Control Assistant position is evaluated one grade higher than the GS-06 position in the Office of Security and is

considered equal to the GS-07 position in the Office of the General Counsel.

E. [REDACTED]

Information Control Asst (Supervisor) GS-07 (IPS Proposed GS-08)

The incumbent of this position has responsibility for managing and organizing the heavy typing workload of the [REDACTED]. She makes determinations of what must be typed on priority basis, assigns work to typists, insures that deadlines are met, reviews correspondence for correct format and spelling, and develops procedures for the typists. In addition, the incumbent spends approximately 25% of her time as secretary to the Chief, IPS.

This position was compared with the GS-08 Word Processing Supervisor position in the Office of Training. The OTR Word Processing Supervisor has a wider range of responsibilities which include supervision of the Word Processing Center, a separate organizational element. Responsibilities also include the regulating and assessing of incoming work requests to determine whether the job can be processed by reviewing content, length, complexity of copy, originator's requirements, and time considerations to determine the most efficient method of processing. Additionally, the position contains responsibility for maintaining direct liaison with OTR officers regarding their requirements for service and future requirements, participating in budget and logistical planning for the Center, and conducting briefings on the operation of the Center. There is also a wider variety of typing requirements levied on the Center than is levied on the [REDACTED] e.g., lectures, correspondence, memoranda, course schedules and outlines, foreign language and other training manuals, etc.

It is recognized that the supervisor of the [REDACTED] possesses considerable responsibility for priority typing and dissemination of correspondence to the public. However, the highest level of journeyman typist functions in the Section evaluates at GS-05. Based on application of the USG supervisory evaluation guide, the position evaluates at GS-07 (two grades above journeyman work) but is not equal to the GS-08 position in OTR.

4. The findings of this position review, excluding the C/IPS position, have been discussed with the Assistant for Information and the Chief, Information and Privacy Staff.

F. W. M. Janney  
Director of Personnel

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